

EXHIBIT 1

MOTION INFORMATION STATEMENT

Docket Number(s): 15-2844-bk; 15-2847-bk, 15-2848-bk

Caption [use short title]

Motion for: Redesignation as Creditors-Appellees-Cross-Appellants

Elliott, et al. v. General Motors LLC, et al. (In re Motors Liquidation Co., et al., f/k/a General Motors Corp., et al.)

Set forth below precise, complete statement of relief sought:

The Participating Unitholders seek to have their designation changed from "Creditors-Appellees" to "Creditors-Appellees-Cross-Appellants."

MOVING PARTY: Participating Unitholders

Plaintiff Defendant
 Appellant/Petitioner Appellee/Respondent

OPPOSING PARTY: See Attachment AMOVING ATTORNEY: Deborah NewmanOPPOSING ATTORNEY: See Attachment A

[name of attorney, with firm, address, phone number and e-mail]

Akin Gump Strauss Hauer & Feld LLPOne Bryant Park, New York, New York 10036(212) 872-7481; djnewman@akingump.comCourt-Judge/Agency appealed from: U.S. Bankruptcy Court for the Southern District of New York/Judge Robert E. Gerber

Please check appropriate boxes:

Has movant notified opposing counsel (required by Local Rule 27.1):

 Yes No (explain): _____

FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND INJUNCTIONS PENDING APPEAL:

Yes No
 Yes No

Opposing counsel's position on motion:

 Unopposed Opposed Don't Know

Has request for relief been made below?

Does opposing counsel intend to file a response:

 Yes No Don't Know

Has this relief been previously sought in this Court?

Requested return date and explanation of emergency: _____

Is oral argument on motion requested?

 Yes No (requests for oral argument will not necessarily be granted)

Has argument date of appeal been set?

 Yes No If yes, enter date: _____

Signature of Moving Attorney:

/s/ Deborah J. Newman Date: 10/05/2015Service by CM/ECF Other [Attach proof of service]

ATTACHMENT A

COUNSEL FOR OTHER PARTIES

BROWN RUDNICK LLP Edward S. Weisfelner David J. Molton May Orenstein Howard S. Steel Seven Times Square New York, NY 10036 Telephone: 212-209-4800 Email: eweisfelner@brownrudnick.com Email: dmolton@brownrudnick.com Email: morenstein@brownrudnick.com Email: hsteel@brownrudnick.com	KING & SPALDING LLP Arthur J. Steinberg Scott I. Davidson 1185 Avenue of the Americas New York, NY 10036 Telephone: 212-556-2100 Email: asteinberg@kslaw.com Email: sdavidson@kslaw.com
STUTZMAN, BROMBERG, ESSERMAN & PLIFKA, P.C. Sander L. Esserman 2323 Bryan Street, Suite 2200 Dallas, TX 75201 Telephone: 214-969-4900 Email: esserman@sbeplaw.com	KIRKLAND & ELLIS LLP Richard C. Godfrey Andrew B. Bloomer 300 North LaSalle Chicago, IL 60654 Telephone: 312-862-2000 Email: rgodfrey@kirkland.com Email: abloomer@kirkland.com <i>Counsel for General Motors LLC</i>
<i>Counsel for Ignition Switch Plaintiffs</i>	
GOLDENBOCK, EISEMAN, ASSOR, BELL & PESKOE, LLP Jonathan L. Flaxer S. Preston Ricardo 437 Madison Avenue New York, NY 10022 Telephone: 212-907-7300 Email: jflaxer@golenbock.com Email: pricardo@golenbock.com	HAGENS BERMAN SOBOL SHAPIRO LLP Steve W. Berman 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 Telephone: 206-623-7292 Email: steve@hbsslaw.com
<i>Counsel for Groman Plaintiffs</i>	<i>Counsel for the People of the State of California, acting by and through Orange County District Attorney Tony Rackauckas and the State of Arizona</i>
Gary Peller 600 New Jersey Avenue, NW Washington, D.C. 20001 Telephone: 202-662-9122 Email: peller@law.georgetown.edu	GOODWIN PROCTER LLP William P. Weintraub Gregory W. Fox The New York Times Building 620 Eighth Avenue

<p><i>Counsel for Elliott, Sesay, Summerville, and Bledsoe Plaintiffs</i></p>	<p>New York, NY 10018 Telephone: 212-813-8800 Email: weintraub@goodwinprocter.com Email: gfox@goodwinprocter.com</p> <p><i>Counsel for Ignition Switch Pre-Closing Accident Plaintiffs</i></p>
<p>WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP Alexander Schmidt Malcolm T. Brown 270 Madison Avenue New York, NY 10016 Telephone: 212-545-4600 Email: schmidt@whafh.com Email: brown@whafh.com</p> <p><i>Counsel for ABC Flooring, Inc., et al.</i></p>	<p>LIEFF, CABRASER, HEIMANN & BERNSTEIN, L.L.P. Elizabeth J. Cabraser 275 Battery Street Embarcadero Center W. San Francisco, CA 94111 Telephone: 415- 956-1000 Email: ecabraser@lchb.com</p> <p><i>Lead Counsel</i></p>
<p>HILLIARD MUÑOZ GONZALES LLP Robert Hilliard 719 South Shoreline Suite 500 Corpus Christi, TX 78401 Telephone: 361-882-1612 Email: bobh@hmglawfirm.com</p> <p><i>Lead Counsel</i></p>	<p>GIBSON, DUNN & CRUTCHER LLP Aric H. Wu Gabriel K. Gillett Adam H. Offenhartz Lisa H. Rubin 200 Park Avenue New York, NY 10166 Telephone: 212-351-2390 Email: awu@gibsondunn.com Email: ggillet@gibsondunn.com Email: aoffenhartz@gibsondunn.com Email: lrubin@gibsondunn.com</p> <p><i>Counsel for Wilmington Trust Company</i></p>

No. 15-2844

**IN THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT**

IN RE: MOTORS LIQUIDATION COMPANY,
Debtor,

IGNITION SWITCH PLAINTIFFS,
IGNITION SWITCH PRE-CLOSING ACCIDENT PLAINTIFFS,
Appellees,

CELESTINE ELLIOTT, LAWRENCE ELLIOTT, BERENICE SUMMERSVILLE,
Appellants-Cross-Appellees,

GROMAN PLAINTIFFS
Appellees,

GENERAL MOTORS LLC,
Appellee-Cross-Appellant,

WILMINGTON TRUST COMPANY,
Appellee-Cross-Appellant,

PARTICIPATING UNITHOLDERS,
Creditors-Appellees.

**PARTICIPATING UNITHOLDERS' UNOPPOSED MOTION FOR
REDESIGNATION AS CREDITORS-APPELLEES-CROSS-APPELLANTS**

ON APPEAL FROM THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Daniel H. Golden
Deborah J. Newman
AKIN GUMP STRAUSS HAUER & FELD LLP
One Bryant Park
New York, New York 10036

Counsel for the Participating Unitholders

CORPORATE DISCLOSURE STATEMENT

Each Participating Unitholder is a limited partnership with no parent corporation, and no publicly held corporation owns a 10 percent or greater interest in any of the Participating Unitholders.

The Participating Unitholders, Creditors-Appellees, in the above-captioned proceeding, respectfully submit this Unopposed Motion for Redesignation as Creditors-Appellees-Cross-Appellants.¹ To properly align the parties and avoid confusion in the record, the Participating Unitholders respectfully request the Court to redesignate them as cross-appellants in addition to the Participating Unitholders' current designation of Creditor-Appellees.

The Motors Liquidation GUC Trust (the "GUC Trust") was established pursuant to Old GM's chapter 11 plan. The Participating Unitholders are holders of beneficial interests in the GUC Trust; the Wilmington Trust Company acts as the trustee for and administrator of the GUC Trust. On June 15, 2015, the Participating Unitholders and Wilmington Trust Company jointly filed a Notice of Cross-Appeal [ECF 13204] in the Bankruptcy Court from the Bankruptcy Court's judgment (the "Judgment") entered on June 1, 2015 [ECF 13177]. On September 9, 2015, this Court granted certain parties' petitions, pursuant to 28 U.S.C. § 158(d)(2), for leave to appeal directly to this Court from the Judgment. Wilmington Trust Company was among those parties seeking leave to appeal directly to this Court; the Participating Unitholders were not (*see* Document 7-1; Case No. 15-2844). Nevertheless, as a result of this Court's order granting a direct appeal from the

¹ The other parties to these proceedings do not oppose the relief sought by the Participating Unitholders in this Motion—designating and treating the Participating Unitholders as appellees and cross-appellants in these proceedings. The Ignition Switch Plaintiffs, the Ignition Switch Pre-Closing Accident Plaintiffs, the Groman Plaintiffs, Celestine Elliott, Lawrence Elliott, Berenice Summerville and the other parties, however, do not take any position as to the representations or arguments made in these Motion papers.

Judgment, all appeals of the Judgment, including the Participating Unitholders' cross-appeal, will be heard by this Court.

The Participating Unitholders along with Wilmington Trust Company have been properly designated as Appellees in this proceeding. However, because Wilmington Trust Company petitioned this Court for a direct appeal, Wilmington Trust Company is also designated as a cross-appellant. The Participating Unitholders noticed their cross-appeal jointly with Wilmington Trust Company, and the Participating Unitholders' cross-appeal will be heard by this Court.²

This Court's Rules provide that "designations may be modified by the parties' agreement . . ." Fed. R. App. P. 28.1(b). The undersigned have conferred with counsel for all other parties to these proceedings, as well as counsel for the proposed intervenors, State of Arizona , People of the State of California, Sesay Plaintiffs, Bledsoe Plaintiffs, and Groman Plaintiffs, and confirmed that these parties agreed to the relief sought in the present Motion. Counsel for the other parties take no position as to any of the argument or representations in this Motion. Further, the rules governing this proceeding provide that "designations may be modified . . . by court order." Fed. R. App. P. 28.1(b).

² In order to avoid unnecessary duplication, wherever possible, the Participating Unitholders anticipate filing briefs in this appeal jointly with Wilmington Trust Company.

Accordingly, in order to properly align the parties and avoid confusion in the record, the Participating Unitholders respectfully request that they be designated as cross-appellants along with Wilmington Trust Company.

CONCLUSION

For the forgoing reasons, the Participating Unitholders respectfully request that this Court enter an Order redesignating them as Creditors-Appellees-Cross-Appellants on this appeal.

Dated: October 5, 2015

Respectfully Submitted,

AKIN GUMP STRAUSS HAUER &
FELD LLP

By: /s/ Deborah J. Newman

Deborah J. Newman
One Bryant Park
New York, New York 10036
T: (212) 872-7481
djnewman@akingump.com

Counsel for the Participating Unitholders